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Attorneys for Genesis Global Holdco, LLC

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re

CASH CLOUD, INC., dba COIN CLOUD,

Debtor.

Case No. 23-10423-mkn

Chapter 11

**GENESIS GLOBAL HOLDCO, LLC'S
 NOTICE OF DEPOSITION OF TANNER
 JAMES**

Date of Deposition: August 22, 2023¹

Time of Deposition: 10:00 a.m.

TO ALL INTERESTED PARTIES AND THEIR RESPECTIVE COUNSEL:

PLEASE TAKE NOTICE that, Genesis Global Holdco, LLC ("Genesis") will take the deposition of Tanner James ("Tanner James") on **August 22, 2023 at 10:00 a.m.**, at the law offices of Shea Larsen, located at 1731 Village Center Circle, Suite 150, Las Vegas, Nevada 89134, upon

¹ Or another date mutually acceptable to the relevant parties.

oral examination, before an officer authorized to administer oaths.² The deposition will be recorded by stenographic means and oral examination will continue from day-to-day until completed.

Genesis intends to question Mr. James on the topics listed below.

TOPICS FOR EXAMINATION

1. The sales and marketing process for the sale of substantially all of Debtor's assets.
2. The preparation of (a) that certain document entitled "7.10.23 Coin Cloud – 506(c) Surcharge Analysis" sent on behalf of the Debtor to counsel for Genesis via email on July 10, 2023 ("Surcharge Analysis"), (b) the *Declaration of Tanner James in Support of Motion for Entry of an Order Authorizing Debtor to Surcharge the Collateral of Genesis Global Holdco, LLC, Enigma Securities Limited, and AVT Nevada, L.P.* [ECF No. 927] (the "James Declaration"), and (c) that certain document entitled "7.26.23 Coin Cloud – Preliminary Sale Analysis vSHARE-C" sent on behalf of the Debtor to counsel for Genesis via email on July 26, 2023 ("Sale Proceeds Analysis").
3. Any analysis, evaluation, or assessment of the necessity or reasonableness of the fees and costs proposed to be surcharged as set forth in the Surcharge Analysis, the Sale Proceeds Analysis, or the James Declaration.
4. Any analysis, evaluation, or assessment of the benefit obtained by Genesis as a result of the fees and costs proposed to be surcharged as set forth in the Surcharge Analysis, the Sale Proceeds Analysis, or the James Declaration.
5. The nature and amount of any fees and costs proposed to be surcharged as set forth in the Surcharge Analysis of the James Declaration.

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² Genesis notices this deposition to take place currently with Enigma Securities Limited's ("Enigma") deposition of the Debtor scheduled to take place at the same time and date as indicated herein. *See* ECF 954.

6. The reasons for a downward adjustment to sale proceeds for adequate protection reservation.

DATED this 3rd day of August 2023.

SNELL & WILMER L.L.P.

/s/ Robert R. Kinas

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